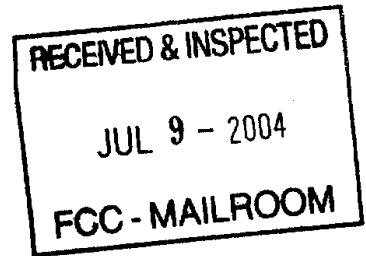


PEMBROKE COMMUNICATIONS

A subsidiary of Pembroke Telephone Company, Inc. *

DOCKET FILE COPY ORIGINAL



June 24, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

Re: In the Matter of the Pay Telephone Reclassification and Compensation
Provisions of the Telecommunications Act of 1996, CC Docket 96-128

Dear Ms. Dortch:

Pembroke Advanced Communications, Inc. ("the Company") submits this letter and accompanying certification as record that the Company is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")¹, released on October 3, 2003.

As the Company is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to Payphone Service Providers, the Company is not subject to such requirements at this time. If the Company's operations are altered to the extent that the Company necessarily becomes a Completing Carrier, the Company will fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

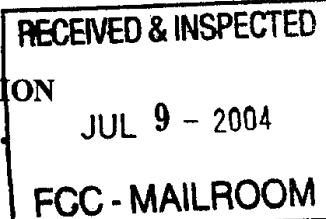
Sincerely,

Mary Anna B. Hite
Secretary-Treasurer
Pembroke Advanced Communications, Inc.

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¹ The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).

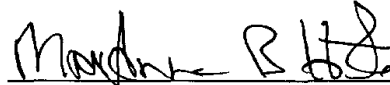
**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF PEMBROKE ADVANCED COMMUNICATIONS, INC.**



1. My name is *Mary Anna B. Hite*. I currently serve as the Secretary-Treasurer of *Pembroke Advanced Communications, Inc. (the Company)*, a provider of interstate interexchange telecommunications services as a toll reseller in the state of Georgia. In this capacity, I have become familiar with the network operations of the Company and its practices associated with the completion of calls originated from Pay Telephones.
2. Pembroke Advanced Communications, Inc. is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. With respect to coinless or access code calls, The Company is a switchless reseller. The Company contracts with Associated Network Partners, Inc. (ANPI) for completion of calls originated by access code.
4. With respect to subscriber toll-free payphone calls, the Company is a switchless reseller. The Company contracts with ANPI for completion subscriber toll-free calls.
5. The Company does not perform call validation or processing functions for either access code calls or subscriber toll-free payphone calls.
6. The Company does not create call detail for either access code calls or subscriber toll-free payphone calls. The Company's action with respect to call detail records is limited to rating and billing.
7. The Company compensates ANPI for the wholesale cost of subscriber toll-free or access code calls.
8. The Company has confirmed with ANPI that any calls purchased by the Company are included in the respective call tracking systems and compensation remittance process of ANPI.
9. In consideration of the aforementioned facts, Pembroke Advanced Communications, Inc. is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 24, 2004.

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996*, CC Docket No. 96-128, Report and Order, (2003) (Order).



MARY ANNA B. HITE

SECRETARY-TREASURER

PEMBROKE ADVANCED COMMUNICATIONS,
INC.

P.O. BOX 10

PEMBROKE, GA 31321
